

ATTACHMENT B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
WEST PALM BEACH DIVISION**

CASE NO. 23-80101-CR-CANNON(s)

UNITED STATES OF AMERICA,

Plaintiff,

v.

**DONALD J. TRUMP,
WALTINE NAUTA, and
CARLOS DE OLIVEIRA,**

Defendants.

GOVERNMENT’S NOTICE OF EXPERT TESTIMONY OF STACY SHAHRANI

The Government hereby files under Federal Rule of Criminal Procedure 16(a)(1)(G), Local Rule 88.10(o)(3), and this Court’s Order (ECF No. 215) its notice of intent to use the following expert testimony in its case-in-chief at trial.

Stacy Shahrani, FBI Special Agent, Digital Forensic Examiner for Computer Analysis Response Team, Washington Field Office

a. Training and Qualifications

Special Agent Shahrani is a digital forensic examiner who has worked for the Federal Bureau of Investigation (“FBI”) since 2008. She conducted criminal investigations involving transnational organized crime and violent crimes against children from 2008 to 2019, including as a digital evidence examiner technician beginning in 2017. From April 2019 to August 2020, Special Agent Shahrani served as a supervisory special agent in the FBI Cyber Division, and, since August 2020, as a digital forensic examiner as part of the Computer Analysis Response Team (“CART”) in the Washington Field Office. Before her service in the FBI, Special Agent Shahrani

served in the U.S. Air Force, first as a lieutenant managing the Chemical Biological Radiological Nuclear and Explosive program for Holloman Air Force Base in New Mexico, and then, as a captain, leading engineering and repair teams in Iraq, Afghanistan, and Peru. She was awarded the Air Force Commendation Medal twice (2003, 2004), the Army Commendation Medal (2006), and the Meritorious Service Medal (2008). Special Agent Shahrani holds a Bachelor of Science degree in Mechanical Engineering from the University of Rhode Island.

Special Agent Shahrani has received professional training in digital forensic analysis, including over 400 hours in digital forensic training and over 250 hours in cyber training. Special Agent Shahrani received an FBI digital extraction technician certification in 2017 and a digital forensic examiner certification in 2022. Special Agent Shahrani has analyzed over 100 electronic devices as an FBI digital forensic examiner.

A copy of Special Agent Shahrani's curriculum vitae has been provided to the defense. *See* USA-01287326 – USA-01287327.

b. Publications and Prior Testimony as an Expert

Special Agent Shahrani has not authored any publications in the last ten years, nor has she testified as an expert at trial or by deposition in the last four years. However, Special Agent Shahrani has, within the last four years, testified as a fact witness in two cases regarding digital forensic extractions and examinations she has conducted: *United States v. Guy Reffitt*, Case Number 21-cr-00032-DLF (D.C.) (trial) and *United States v. Luis Escobosa*, Case Number 16-cr-6-WFK (E.D.N.Y.) (supervised release hearing).

c. Report Provided under Federal Rule of Criminal Procedure 16(a)(1)(F)

The Government produced to the defense Special Agent Shahrani's digital forensic reports. *See* USA-01286194 – USA-01286274.

d. Complete Statement of Testimony/Opinion and Basis

Special Agent Shahrani will testify that she conducted a forensic analysis of two electronic accounts: (1) the Apple iCloud account associated with Waltine Nauta's Gmail email account and Apple DSID (designated FBI evidence item 1B1) and (2) the Apple iCloud account associated with the Nauta's 45 Office email account and Apple DSID (designated FBI evidence item 1B4), which the Government obtained from court-authorized search warrants for those accounts used by defendant Waltine Nauta.¹ In her testimony, Special Agent Shahrani will explain that records from the Apple iCloud account associated with the Nauta's Gmail email account indicate that this account was set to receive iMessages from both the phone number ending in 8611 and the phone number ending in 6091.

The Government anticipates that Special Agent Shahrani will also testify that she conducted a forensic extraction and forensic analysis of an Apple iPhone 13 Pro Max, IMEI 355380250576912 (designated FBI evidence item 1B4), and forensic imaging of a Dell Vostro Laptop, Service tag 6TVR503, serial number CN07N722915007S6H (designated FBI evidence item 1B5), both used by Trump Employee 2 (as that person is referred to in the Superseding Indictment, whose identify the Government has provided to the defense) and searched after the Government obtained a court-authorized search warrant for those devices.²

¹ The unclassified contents of those accounts, after a filter review was conducted for attorney-client privilege and scoping within the parameters of the search warrant, was provided to the defense in Production 1. *See* USA-00544137 – USA-00637698. The portions of the Nauta iCloud accounts with images containing visible classification markings were produced in classified discovery.

² The contents of those devices, after a filter review was conducted for attorney-client privilege and scoping within the parameters of the search warrant, was provided to the defense in discovery. *See* USA-00416469 – USA-00447955 (laptop) and USA-00492118 – USA-00509692 (phone).

The Government expects that Special Agent Shahrani will testify as to the manner in which she handled the electronic accounts and devices, the forensic examination tools she used, and the reports generated as a result of the forensic examinations. Special Agent Shahrani will explain how verification procedures were used to ensure that the forensic processing yielded reliable and accurate copies of the data found on the digital devices. Special Agent Shahrani will also explain how certain text communications, images, and call records were found on the iCloud accounts and electronic devices, as well as the metadata for certain communications and images.

Additionally, Special Agent Shahrani will describe how she conducted a physical inventory of the devices, removed the Subscriber Identity Module (commonly referred to as a SIM) card from the phone and used Graykey hardware/software for data extraction, and used write-blocking technology to protect the integrity of the original laptop evidence when creating a forensic image for later examination. Furthermore, for the iCloud accounts, Special Agent Shahrani retrieved the decrypted data contained in the Nauta iCloud warrants, obtained the hash value of the decrypted production to ensure the data remained unchanged during her subsequent review and analysis, processed the images contained using Axiom and Cellebrite software, and selected all available applications to be examined.

The Government anticipates that Special Agent Shahrani will also testify that she was asked to review Nauta's iCloud accounts and the two aforementioned devices, used by Trump Employee 2, for documents with classification markings. Special Agent Shahrani found that two photos containing classification markings were texted to Trump Employee 2 from an Apple iPhone with metadata matching the identifying information obtained by the Government from Nauta's iPhone ending in phone number 6091. The metadata included information that the photos were taken using "Walt's phone" and the IMEI number matched the known IMEI number of Nauta's

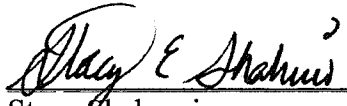
phone with the phone number ending in 6091. The first photo containing a classification marking was taken and texted on October 27, 2021,³ and the second, which is referenced in the Superseding Indictment in paragraph 32 and Count 8, was taken on December 7, 2021. Special Agent Shahrani will describe where within the iCloud account and devices these photos were located. Additionally, Special Agent Shahrani generated a redacted Cellebrite reader report with the items containing classification markings excluded, as well as an HTML report that was provided in classified discovery. *See* Disc_004, Classified Production 3, produced on October 6, 2023.

In addition to the two photos, Special Agent Shahrani will testify that she located the same two images with classification markings on the Apple iPhone 13 Pro Max (items 1B4), for which she generated an HTML report that was provided in classified discovery. *See* Disc_004, Classified Production 3, produced on October 6, 2023.

e. Approval of Disclosure

Pursuant to Federal Rule of Criminal Procedure 16(a)(1)(G)(v), I have reviewed this disclosure and approve of its contents.

Date: January 10, 2024


Stacy Shahrani
Digital Forensic Examiner
FBI

³ The document depicted in the October 27, 2021 photo was subsequently declassified and produced in unclassified discovery. *See* USA-01285830.